

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DODONA I, LLC, on Behalf of Itself :
and All Others Similarly Situated, :
Plaintiff, : 10 Civ. 7497 (VM)(DCF)
v. :
GOLDMAN, SACHS & CO., et al., :
Defendants. :
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STIPULATION AND [PROPOSED] ORDER

Plaintiff Dodona I, LLC (“Plaintiff”) and Defendants Goldman, Sachs & Co., The Goldman Sachs Group, Inc., Peter L. Ostrem, and Darryl K. Herrick (the “Goldman Sachs Defendants”) (together, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on December 17, 2012, Plaintiff filed its Motion for Class Certification and Appointment of Class Representative and Class Counsel (Dkt. 107) (“Motion for Class Certification”);

WHEREAS, on May 15, 2013, Defendants filed their Opposition to Plaintiff’s Motion for Class Certification and Appointment of Class Representative and Class Counsel (Dkt. 119) (“Opposition”);

WHEREAS, the Civil Case Management Plan and Scheduling Order (Dkt. 89) entered by the Court on June 4, 2012, as amended on September 28, 2012 (Dkt. 94) (“Initial Scheduling Order”) set a fact discovery deadline of March 14, 2013 and directed the Parties to “meet and confer regarding a briefing schedule concerning plaintiff’s motion for class certification and the

depositions of any experts on whom the parties may rely or intend to rely in support of, or in opposition to, plaintiff's motion for class certification";

WHEREAS, the Revised Civil Case Management Plan and Scheduling Order (Dkt. 114) entered by the Court on March 18, 2013 ("Revised Scheduling Order") set a fact discovery deadline of July 29, 2013 and a deadline of July 31, 2013 for Plaintiff's reply in further support of its Motion for Class Certification.

NOW, THEREFORE, it is hereby ordered that:

1. Plaintiff shall have until September 16, 2013 to file a reply in further support of its Motion for Class Certification.
2. The fact discovery deadline shall be extended to September 16, 2013. This extension is made without prejudice and with the understanding that the Parties will cooperate and act in good faith in the scheduling and production of discovery in order to meet this deadline.
3. The Parties reserve their right to seek additional scheduling extensions for good cause shown.

SO ORDERED.

Dated: 7/11/13


HONORABLE DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Dated: July 3, 2013

Berger & Montague, P.C.

Lawrence J. Lederer by Susan Moore

Lawrence J. Lederer (llederer@bm.net) *w/ permission*
Robin Switzenbaum (rswitzenbaum@bm.net)
Arthur Stock (astock@bm.net)
Steven L. Bloch (sblock@bm.net)
Lane L. Vines (lvines@bm.net)
Jon Lambiras (jlambiras@bm.net)
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604

*Lead Counsel for Lead Plaintiff Dodona I, LLC
and the Proposed Class*

- and -

David S. Friedman (dfriedman@gkblaw.com)
Gusrae Kaplan Nusbaum, PLLC
120 Wall Street
New York, NY 10005
Telephone: (212) 269-1400
Facsimile: (212) 809-5449

*Local Counsel for Lead Plaintiff Dodona I, LLC
and the Proposed Class*

Schulte Roth & Zabel LLP

Barry A. Bohrer - JMC
Barry A. Bohrer (barry.bohrer@srz.com)
919 Third Avenue
New York, New York 10022
Telephone: (212) 756-2380
Facsimile: (212) 593-5955

Co-counsel for Defendant Peter L. Ostrem

Respectfully submitted,

Sullivan & Cromwell LLP

Richard H. Klapper

Richard H. Klapper (klapperr@sullcrom.com)
Theodore Edelman (edelman@sullcrom.com)
Michael T. Tomaino, Jr. (tomainom@sullcrom.com)
Jacob M. Croke (crokej@sullcrom.com)
125 Broad Street
New York, New York 10004-2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

- and -

Cohen & Gresser LLP

Lawrence T. Gresser
(ltgesser@cohengresser.com)
Brett Jaffe (bjaffe@cohengresser.com)
Nathaniel P.T. Read (nread@cohengresser.com)
800 Third Avenue
New York, New York 10022
Telephone: (212) 957-7600
Facsimile: (212) 957-4514

Counsel for the Goldman Sachs Defendants

Emmet, Marvin & Martin, LLP

Paul T. Weinstein - JMC

Paul T. Weinstein (pweinstein@emmetmarvin.com)
120 Broadway, 32nd Floor
New York, New York 10271
Telephone: (212) 238-3000
Facsimile: (212) 238-3100

Co-counsel for Defendant Darryl K. Herrick